

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JOHN DOE,

*

Plaintiff,

*

v.

* Civil Action No. RDB-23-3507

**UNIVERSITY OF MARYLAND,
COLLEGE PARK, *et al.***

*

*

Defendants.

*

**CONSENT MOTION TO EXTEND DEADLINE TO REPLY TO DEFENDANT
NASTASE’S PARTIAL MOTION TO DISMISS**

Plaintiff John Doe (“Doe”), through undersigned counsel, hereby moves pursuant to Rules 6(b) and 7(b) of the Federal Rules of Civil Procedure and Rule 105(9) of this Court’s Local Rules for a brief extension of time for Doe to file reply to Defendant Nastase’s Motion to Dismiss from February 21, 2024 to March 18, 2024, and states as follows:

1. On February 7, 2024, Defendant Nastase filed a partial motion to dismiss.
2. In that same filing, she included her response to Plaintiff’s Amended Motion for Preliminary Injunction.
3. Plaintiff filed his Amended Motion for Preliminary Injunction pursuant to a schedule set by the Court; that motion has now been fully briefed and it is the parties’ understanding that the Court will set a hearing on that motion at its earliest convenience.
4. By Local Rule, Plaintiff has until February 21 to respond to the partial motion to dismiss.
5. Plaintiff has also sued Angela McGinn, who through counsel requested and received an extension of her time to respond to the Amended Complaint through and including March 4, 2024.

6. Plaintiff expects Defendant McGinn to raise the same arguments by motion as raised by Defendant Nastase in her motion to dismiss.

7. Thus, for efficiency's sake, Plaintiff seeks to extend the time in which he has to respond to Defendant Nastase's partial motion to dismiss through and including March 18, 2024, the same date he would have to respond to a motion to dismiss that Defendant McGinn might file.

8. Defendant Nastase consents to the relief sought.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and enter the accompanying order.

Dated: February 19, 2024

Respectfully Submitted,

/s/ William N. Sinclair

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that, on this 19th day of February, 2024, the foregoing Motion to Extend and accompanying Proposed Order was served by CM/ECF on all registered CMF users on the following:

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Dated: February 19, 2024

Respectfully Submitted,

/s/ William N. Sinclair

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